

Comment submitted in response to Section 63.71 Application by Touch America to Discontinue Domestic Telecommunication Service

January 22, 2004

Federal Communication Commission
Washington, DC 20554

Reference: Section 63.71 Application of Touch America
WC Docket No. 03-259

In early December 2003, Space Imaging was notified by Qwest Communications that Qwest was to acquire Touch America's Frame Relay network equipment. Space Imaging never received direct notification from Touch America of the Discontinuance of Service or what exactly would take place on January 31st, 2004.

Because of this lack of information Space Imaging was constrained from developing a migration plan so as to avoid any disruption of service to our other sites. One of these sites is our Customer Service Center and the other is a Ground Station for collecting satellite imagery. The disruption of service to either location would adversely impact our ability to place orders, support our customers and gather and disseminate our satellite imagery. In addition, any disruption in our service would adversely affect our ability to support the National Geospatial-Intelligence Agency.

To allow us sufficient time to complete the transfer of Frame Relay service to Qwest Communications we are therefore asking the FCC not to authorize the discontinuance of Frame Relay service to Space Imaging until February 28th, 2004.

Respectfully

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Space Imaging